



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Region 6

1445 Ross Avenue, Suite 1200

Dallas, TX 75202-2733

May 05, 2014

Maria T. Garcia
Forest Supervisor
Santa Fe National Forest
11 Forest Lane
Santa Fe, NM 87508

Juan E. Sanchez
Forest Supervisor
Carson National Forest
208 Cruz Alta Road
Taos, NM 87571

Dear Forest Supervisors:

In accordance with our responsibilities under Section 309 of the Clean Air Act (CAA), the National Environmental Policy Act (NEPA), and the Council on Environmental Quality (CEQ) regulations for implementing NEPA, the U.S. Environmental Protection Agency (EPA) Region 6 office in Dallas, Texas, has completed its review of the Draft Supplemental Environmental Impact Statement (DSEIS) prepared by the US Forest Service for the Invasive Plant Control Project for the Santa Fe and Carson National Forests. The purpose of the project is to control or eradicate weed infestations on the two National Forest lands.

EPA has rated the DSEIS as **EC-2 "Environmental Concerns and Insufficient Information"**. The EPA's Rating System Criteria can be found here: <http://www.epa.gov/oecaerth/nepa/comments/ratings.html>. EPA has environmental concerns and is requesting additional information in the area of Environmental Justice and Tribal Coordination. We have enclosed detailed comments that identify our concerns and recommendations for additional analysis for the Final SEIS (FSEIS).

EPA appreciates the opportunity to review the DSEIS. Please note that a copy of this letter will be published on our website, <http://www.epa.gov/compliance/nepa/eisdata.html>, in order to fulfill our responsibility under Section 309 of the CAA to inform the public of our views on the proposed Federal action. Please send our office one copy of the FSEIS when it is filed using our *e-NEPA Electronic Filing System* (<http://www.epa.gov/compliance/nepa/submiteis/index.html>). If you have any questions or concerns, please contact me or Michael Jansky of my staff at (214) 665-8006 or (214) 665-7438 or via email at smith.rhonda@epa.gov or jasnky.michael@epa.gov respectively for assistance.

Sincerely,

A handwritten signature in dark ink, appearing to read "Rhonda", is written over the typed name.

Rhonda Smith
Chief, Office of Planning and
Coordination

A handwritten signature in dark ink, appearing to read "Michael", is written to the right of Rhonda Smith's signature.

Enclosure

**DETAILED COMMENTS
ON THE
US FOREST SERVICE
DRAFT SUPPLEMENTAL ENVIRONMENTAL IMPACT STATEMENT
FOR THE
INVASIVE PLANT CONTROL PROJECT, SANTA FE AND CARSON NATIONAL FOREST
NEW MEXICO**

We are offering the following comments on Environmental Justice and Tribal Resources for your consideration in preparing the Final SEIS (FSEIS). Our concerns are as follows:

Environmental Justice: The DSEIS describes the demographics of the project area and the potential impacts and acknowledges that there is a meaningfully greater percentage of minority and/or low income residents. Although the DSEIS states that the risks to residents of herbicide application will be low under certain alternatives and cites risk assessments and other information to minimize impacts; there is no discussion of actions that could be taken in the event of an accident or incorrect application.

Recommendation:

The FSEIS should describe monitoring, emergency response or potential enforcement actions in the event of an accident or other circumstances.

Another concern is that minority or low income communities may not subscribe to local papers and may have language or cultural barriers that necessitate a more specific outreach plan.

Recommendation:

The FSEIS needs to specifically describe these types of potential impacts and mitigation for them.

Tribal Resources: The DSEIS is not clear whether Tribal Nations were contacted for government-to-government consultation under Executive Order (EO)13175.

Recommendation:

The FEIS should state which Tribal governments were contacted and their responses to the project.